

December 5, 1997

VIA FEDERAL EXPRESS

8 1997

Office of the Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20554

Re: No. CCD 92-237; In the Matter of Administration of the North American
Numbering Plan, Carrier Identification Codes (CIC's)

Enclosed for filing in the above captioned matter are an original and four
(4) copies of a Petition of Albion Telephone Company, Inc. for Waiver of the
January 1, 1998 Implementation Date for 4-Digit CIC. We trust that the
enclosed will be found in order for filing and grant.

Should you require any further information, or have any questions
regarding this filing, please call my office directly at (719) 594-5800.

Sincerely,

Raymond A. Hendershot
Vice-President

Enclosures

cc: - - Service List

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GVNW INC./MANAGEMENT

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

Administration of the)

North American Numbering Plan,)

Carrier Identification Codes (CICs))

CC Docket No. 92-237

PETITION OF ALBION TELEPHONE COMPANY, INC.

FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION
DATE FOR 4-DIGIT CIC

GVNW, Inc.
2270 La Montana Way
Colorado Springs, Colorado 80918

Date Submitted: December 5, 1997

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North American Numbering Plan,) CC Docket No. 92-237
Carrier Identification Codes (CICs))

PETITION OF ALBION TELEPHONE COMPANY, INC.

FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION
DATE FOR 4-DIGIT CIC

I. Introduction

Albion Telephone Company, Inc. ("Albion"), by its consultant, and pursuant to the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "Four Digit Carrier Identification Code ("CIC") Order"), hereby requests a temporary waiver of the requirement that all Local Exchange Carriers ("LECs") that are equal access complete upgrades to their switches to recognize four digit CICs by January 1, 1998.

In the Four Digit CIC Order, the FCC reaffirmed its requirement that LECs that provide equal access must convert their switches to accept four digit CICs by January 1, 1998. The FCC also extended the permissive period to June 30, 1998 during which three and four digit CICs would continue to be accepted.

Paragraph 20 of the Order reads "First, we determine that LEC end office switches must be upgraded to accept four-digit CICs by January 1, 1998. Second, we determine

that the transition during which use of both three-digit CICs and five-digit CACs may continue will end on June 30, 1998, rather than on January 1, 1998."

Further, paragraph 24 states, "If we receive a complaint of LEC noncompliance, infeasibility with that deadline will not relieve a defendant LEC of liability under section 208 of the Commission's rules. A LEC that determines that it will not meet the January 1, 1998 conversion deadline must seek relief from the Commission prior to that date."

In compliance with the FCC's Order on Reconsideration, specifically at paragraph 24, Albion is seeking relief of the FCC's conversion deadline of January 1, 1998, by this request for waiver. Albion will identify special circumstances that warrant a deviation from the Order and that a waiver will serve the public interest. Albion will show good cause that a waiver of the Commission's Order is necessary and appropriate, as well as in the public interest.

II. Background

Albion originally converted its central offices to equal access in 1992. During the planning stages of their equal access conversion, the industry was working to resolve the problem of the rapid depletion of the supply of three digit CICs. The FCC released its Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "CICs NPRM") on April 4th, 1994. In the CICs NPRM, the FCC proposed a six year transition period from three to four digit CICs. Since Albion had just completed upgrading its switch network, Albion concluded that it was not economically feasible to upgrade the switches, purely to accommodate the future four digit CIC requirement. All of Albion's switches, including Albion, Almo, Elba, Holbrook and Malta are currently stand alone switches. Due to the

inherent nature of stand alone network architecture, each switch must be upgraded individually, at substantial cost, to provide four digit CIC capability. Albion determined the most economic course of action would be to install four digit CIC capability during the next switch upgrade cycle.

In 1994, Albion began work on purchasing additional Idaho properties from US West. Albion planned to incorporate the new properties into the next switch upgrade cycle to take advantage of synergy's between the original Albion exchanges and the newly acquired exchanges. This acquisition was finalized on October 18th, 1996.

At the end of 1996, after the US West acquisition was completed, Albion devised a construction plan to upgrade all switches to four digit CIC capability. The plan included changing out the acquired exchanges of Mackay, Moore, and Howe switches to be remotes off of the Arco host switch. In addition, the plan called for changing out Albion's Almo, Elba, Malta and Raft River switches to be remotes off of the Albion switch. Finally, an upgrade was planned for the Holbrook switch to be a remote off of a host switch in the acquired Malad exchange. Albion's construction plan would not only provide switch upgrades with the latest in digital software, including four digit CIC capability, it would also minimize the cost of future upgrades since, with this type of network, only the host switch would need to be upgraded, rather than each individual stand alone switch.

In April 1997, The FCC released it's Second Report and Order, CC Docket No. 92-237, (hereafter "CICs Second Report and Order") affirming the CICs NPRM's proposed conversion from three to four digit CICs and shortening the proposed transition period from a six year transition to a two-year and nine-month transition. By the time the

CICs Second Report and Order was released, Albion's upgrade plan was being implemented, however, due to the sheer amount of work associated with upgrading every switch in Albion's network, the January 1, 1998 date is not technically feasible.

The Albion switch was upgraded in June of 1997 and is four digit CIC capable. Upgrades to the Malad, Arco, Mackay Moore and Howe exchanges were completed in October 1997, making them all four digit CIC capable. The five remaining upgraded remote switches for Almo, Holbrook, Elba, Malta and Raft River were shipped in November 1997. Installation and conversion of these five switches will be completed between April and June 1998. Albion therefore requests an extension to June 30, 1998 in order to comply with the four digit CIC code capability requirement.

III. A Waiver of the Commission Rules is Necessary and in the Public Interest

Albion is unable to meet the January 1, 1998 deadline for economic and technical reasons in the public interest, as outlined above. Albion is working diligently toward compliance with the four digit CIC capability requirement, and requests an extension of the deadline to June 30, 1998.

IV. Conclusion

Albion will make every effort to ensure it is able to comply with the June 30, 1998 extension. Grant of the extension is in the public interest because the costs to avoid the extension would have clearly outweighed the benefits to the users of telecommunications services.

For the foregoing reasons, Albion requests that the Commission extend the time for Albion to convert its Almo, Holbrook, Elba, Malta and Raft River exchanges to June 30th, 1998.




Raymond A. Hendershot
Vice President, GVNW Inc./Management

12 Dec. 1997
Date

**DECLARATION OF Rich Redman
Manager, Albion Telephone, Inc.**

I, Rich Redman, manager for Albion Telephone Company, Inc., do hereby declare under penalties of perjury that I have read the foregoing "Petition for Waiver" and the information contained therein regarding Albion Telephone Company, Inc. is true and accurate to the best of my knowledge, information, and belief.

Date: 12/5/97


Rich Redman
Albion Telephone, Inc.

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